



which are near waterways. However, Mobile Marine Radio overlooks the fact that there are several landlocked metropolitan areas (e.g., Denver and Phoenix) in which there are spectrum shortages for land mobile users, and little or no use of the Maritime channels proposed for sharing.

Moreover, shortages of public safety frequencies are not limited to major metropolitan areas. Many rural and less densely populated areas have needs for wide-area and mobile relay systems for which VHF channels may be the only appropriate frequencies. Yet, Land Mobile VHF channels are scarce, even in many rural areas, and many public safety users are forced to rely upon interservice sharing with other Land Mobile services to satisfy their needs for VHF channels. Unfortunately, channels are not always available for interservice sharing. Therefore, there is a need to reallocate a portion of otherwise vacant Maritime channels for public safety land mobile use where possible.

Global Maritime Communications Systems and Ross Engineering Company oppose sharing of the Maritime channels because of a perceived potential for increased use of the channels by recreational boaters. Yet, they also demonstrate that cellular telephone carriers provide the same services by default. This suggests that there is no need to use Maritime channels for this purpose, and that those channels should be put to the higher priority use of providing additional channels for public safety.

Finally, APCO wishes to clarify its suggestion that the Commission hold this action in abeyance until a resolution on PR Docket 92-235 is reached. APCO's proposal was based its position that the FCC should extend "re-farming" to the entire 150-160 MHz spectrum, not just the Private Land Mobile Radio Services. However, in the event that the Commission believes the Maritime channel sharing issue should be resolved at this time, APCO does not object and, in fact, would support such action, provided the priorities of public safety are recognized and a number of the channels are dedicated for public safety use only.

CONCLUSION

For the reasons discussed above and in its initial comments, APCO urges the Commission to permit Land Mobile sharing of certain specified Maritime channels in areas where those channels are otherwise unused, and to reserve a portion of the shared channels for exclusive public safety use.

Respectfully submitted,

ASSOCIATED PUBLIC-SAFETY